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**From:** Schechter, Kathryn [Schechter.Kathryn@epa.gov]  
**Sent:** 10/21/2020 11:16:42 AM  
**To:** Henry, Tala [Henry.Tala@epa.gov]; Griffin, Stephanie [griffin.stephanie@epa.gov]  
**CC:** Lee, Virginia [Lee.Virginia@epa.gov]  
**Subject:** RE: Petition to Require Testing on PFAS Under Section 21 of TSCA

Sorry, sent it on the CBI side....

Dr. Kathy Schechter  
Chemist, Industrial Chemistry Branch (MC-7406M)  
1201 Constitution Ave., NW  
Washington, DC 20460  
Telephone: (202) 564-8589  
Fax: (202) 564-8679

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**From:** Henry, Tala <Henry.Tala@epa.gov>  
**Sent:** Tuesday, October 20, 2020 6:10 PM  
**To:** Schechter, Kathryn <Schechter.Kathryn@epa.gov>; Griffin, Stephanie <griffin.stephanie@epa.gov>  
**Cc:** Lee, Virginia <Lee.Virginia@epa.gov>  
**Subject:** RE: Petition to Require Testing on PFAS Under Section 21 of TSCA  
**Importance:** High

Thanks for this so quickly.

Still need the list of chemicals we are thinking to be subject to the Section 8 rule...for the PFAS Coordinating Committee...

Tala R. Henry, Ph.D.  
Deputy Director  
Office of Pollution Prevention & Toxics

T: 202-564-2959  
E: [henry.tala@epa.gov](mailto:henry.tala@epa.gov)

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**From:** Schechter, Kathryn <Schechter.Kathryn@epa.gov>  
**Sent:** Tuesday, October 20, 2020 3:43 PM  
**To:** Griffin, Stephanie <griffin.stephanie@epa.gov>; Henry, Tala <Henry.Tala@epa.gov>  
**Cc:** Lee, Virginia <Lee.Virginia@epa.gov>  
**Subject:** RE: Petition to Require Testing on PFAS Under Section 21 of TSCA

Thanks. Here is what I have. Several chemicals do not meet our working definition of PFAS, are not on the TSCA Inventory, and some are on the inventory but are not active. It should be noted that several of the ones that do not meet our definition (the polyethers) may be on the TSCA Inventory as a component of a UVCB mixture where other components meet our definition. I put it all into a spreadsheet for everyone to review.

As for the ones that do not have CAS numbers, I may not be able to say much about them as they may be on the confidential inventory. Looks like they are byproducts...

Kathy

Dr. Kathy Schechter  
Chemist, Industrial Chemistry Branch (MC-7406M)

1201 Constitution Ave., NW  
Washington, DC 20460  
Telephone: (202) 564-8589  
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**From:** Griffin, Stephanie <[griffin.stephanie@epa.gov](mailto:griffin.stephanie@epa.gov)>  
**Sent:** Tuesday, October 20, 2020 1:31 PM  
**To:** Schechter, Kathryn <[Schechter.Kathryn@epa.gov](mailto:Schechter.Kathryn@epa.gov)>  
**Subject:** FW: Petition to Require Testing on PFAS Under Section 21 of TSCA

Hi Kathy,  
First off, I'm sorry I missed you last week as I started taking over some of Hannah's responsibilities for the 8(a) data call. I'm looking forward to working with you more closely over the next few months!

If you haven't already received it, here is the section 21 petition for 54 PFAS. Would you be able to confirm if these are all included on the data call's list so far? I believe Tala was also interested in knowing their Inventory active/inactive statuses.

Thanks,  
Stephanie Griffin  
Toxics Release Inventory Program  
U.S. Environmental Protection Agency  
(202) 564-1463  
[Griffin.Stephanie@epa.gov](mailto:Griffin.Stephanie@epa.gov)

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**From:** Lee, Virginia <[Lee.Virginia@epa.gov](mailto:Lee.Virginia@epa.gov)>  
**Sent:** Thursday, October 15, 2020 12:27 PM  
**To:** Griffin, Stephanie <[griffin.stephanie@epa.gov](mailto:griffin.stephanie@epa.gov)>  
**Cc:** Turk, David <[Turk.David@epa.gov](mailto:Turk.David@epa.gov)>  
**Subject:** FW: Petition to Require Testing on PFAS Under Section 21 of TSCA

Steph, as mentioned, here's the citizen petition that lists the 54 PFAS chemicals that they're demanding test rules for. It would be good to crosswalk this w/our PFAS 8a rule definition scope to make sure these 54 PFAS are included.

Virginia Lee  
Associate Chief  
Chemical Information and Testing Branch  
U.S. Environmental Protection Agency  
Office of Pollution Prevention and Toxics  
Phone: (202) 564-4142

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**From:** Le, Madison <[Le.Madison@epa.gov](mailto:Le.Madison@epa.gov)>  
**Sent:** Wednesday, October 14, 2020 10:34 AM  
**To:** Lee, Virginia <[Lee.Virginia@epa.gov](mailto:Lee.Virginia@epa.gov)>; Widawsky, David <[Widawsky.David@epa.gov](mailto:Widawsky.David@epa.gov)>; Turk, David <[Turk.David@epa.gov](mailto:Turk.David@epa.gov)>; Reisman, Larry <[Reisman.Larry@epa.gov](mailto:Reisman.Larry@epa.gov)>  
**Cc:** Henry, Tala <[Henry.Tala@epa.gov](mailto:Henry.Tala@epa.gov)>; Passe, Loraine <[Passe.Loraine@epa.gov](mailto:Passe.Loraine@epa.gov)>  
**Subject:** RE: Petition to Require Testing on PFAS Under Section 21 of TSCA

Here you go.

Madison H. Le  
Division Director  
USEPA/OCSPP/OPPT

Direct: 202-564-5754

Cell: Ex. 6 Personal Privacy (PP)

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**From:** Lee, Virginia <Lee.Virginia@epa.gov>

**Sent:** Wednesday, October 14, 2020 9:36 AM

**To:** Le, Madison <Le.Madison@epa.gov>; Widawsky, David <Widawsky.David@epa.gov>; Turk, David <Turk.David@epa.gov>; Reisman, Larry <Reisman.Larry@epa.gov>

**Cc:** Henry, Tala <Henry.Tala@epa.gov>; Passe, Loraine <Passe.Loraine@epa.gov>

**Subject:** RE: Petition to Require Testing on PFAS Under Section 21 of TSCA

Madison, could you send the petition attachment? Thank you!

Virginia Lee

Associate Chief

Chemical Information and Testing Branch

U.S. Environmental Protection Agency

Office of Pollution Prevention and Toxics

Phone: (202) 564-4142

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**From:** Le, Madison <Le.Madison@epa.gov>

**Sent:** Wednesday, October 14, 2020 8:11 AM

**To:** Widawsky, David <Widawsky.David@epa.gov>; Turk, David <Turk.David@epa.gov>; Reisman, Larry <Reisman.Larry@epa.gov>; Lee, Virginia <Lee.Virginia@epa.gov>

**Cc:** Henry, Tala <Henry.Tala@epa.gov>; Passe, Loraine <Passe.Loraine@epa.gov>

**Subject:** Fwd: Petition to Require Testing on PFAS Under Section 21 of TSCA

FYI

Sent from my iPhone

Begin forwarded message:

**From:** "Dunn, Alexandra" <dunn.alexandra@epa.gov>

**Date:** October 14, 2020 at 7:55:54 AM EDT

**To:** "Fischer, David" <Fischer.David@epa.gov>, "Collazo Reyes, Yvette" <CollazoReyes.Yvette@epa.gov>, "Henry, Tala" <Henry.Tala@epa.gov>, "Le, Madison" <Le.Madison@epa.gov>, "Canavan, Sheila" <Canavan.Sheila@epa.gov>, "Dennis, Allison" <Dennis.Allison@epa.gov>, "Dunton, Cheryl" <Dunton.Cheryl@epa.gov>

**Subject:** RE: Petition to Require Testing on PFAS Under Section 21 of TSCA

Please work on a desk statement as we will get questions on this today.

Alexandra Dapolito Dunn, Esq.

Assistant Administrator

Office of Chemical Safety and Pollution Prevention

US Environmental Protection Agency

Washington, DC

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**From:** bobsussman1@ Ex. 6 Personal Privacy (PP)

**Sent:** Wednesday, October 14, 2020 7:35 AM

**To:** Wheeler, Andrew <wheeler.andrew@epa.gov>; Dunn, Alexandra <dunn.alexandra@epa.gov>; Fischer, David <Fischer.David@epa.gov>; Collazo Reyes, Yvette <CollazoReyes.Yvette@epa.gov>; Henry,

Tala <[Henry.Tala@epa.gov](mailto:Henry.Tala@epa.gov)>; Le, Madison <[Le.Madison@epa.gov](mailto:Le.Madison@epa.gov)>; Canavan, Sheila  
<[Canavan.Sheila@epa.gov](mailto:Canavan.Sheila@epa.gov)>

**Cc:** 'Thomas Fox' <[tom@ceh.org](mailto:tom@ceh.org)>; 'Andrea Braswell' <[Andrea@ceh.org](mailto:Andrea@ceh.org)>

**Subject:** Petition to Require Testing on PFAS Under Section 21 of TSCA

Dear EPA Administrator Wheeler:

I am enclosing a petition under section 21 of the Toxic Substances Control Act (TSCA) by six public health and environmental justice organizations in North Carolina: Center for Environmental Health, Cape Fear River Watch, Clean Cape Fear, NC Black Alliance, Democracy Green and Toxic Free NC. The petition requests that the Environmental Protection Agency (EPA) require health and environmental effects testing on 54 Per- and Polyfluoroalkyl Substances (PFAS) manufactured by The Chemours Company (Chemours) at its chemical production facility in Fayetteville, North Carolina. The petition seeks issuance of a rule or order under section 4 of TSCA compelling Chemours to fund and carry out this testing under the direction of a panel of independent scientists. The 54 PFAS have been found in human blood, drinking water, groundwater, soil, air, and locally produced food adjacent to and downstream of the Fayetteville plant as a result of emissions and discharges spanning decades. Despite this extensive exposure, little testing has been conducted on the 54 PFAS and Cape Fear communities lack information on the health impacts to which they and their families have been subjected. As demonstrated in the petition, the 54 PFAS meet the criteria for testing in section 4(a) of TSCA.

PFAS “forever chemicals” are a large group of nearly 5,000 synthetic chemicals that are readily transported around the globe and build up in people and wildlife. These chemicals take thousands of years to break down in the environment and can remain in our bodies for decades. Certain PFAS are pervasive in the blood of the US population. The enclosed petition builds on existing scientific understanding of the properties of PFAS as a class by proposing that the 54 PFAS produced by Chemours be tested for the adverse health and environmental effects that have been linked to well-studied class members, such as PFOA and PFOS. These end-points include cancer, thyroid disease, birth defects, hormone disruption, decreased fertility, immune system suppression. The proposed testing includes studies in laboratory animals as well as research into the relationship between health outcomes and PFAS exposure among people in Cape Fear communities. Studies to determine effects on fish and how the PFAS behave in the environment would also be conducted.

While the proposed testing is critical to understand the health and environmental impacts of these PFAS on Cape Fear communities, it should not delay essential steps to phase out manufacture and use of PFAS in North Carolina and the entire US based on the demonstrated characteristics of the PFAS class. Nor should it delay implementation of measures now in place to restrict or eliminate environmental releases from the Chemours facility.

We look forward to the Agency’s response to the petition and plan to follow-up on the petition with your staff.

Respectfully submitted

Robert M. Sussman  
Sussman & Associates  
3101 Garfield Steet, NW  
Washington DC 20008

**Ex. 6 Personal Privacy (PP)**

Ex. 6 Personal Privacy (PP) (C)

202-758-2227 (O)

*Counsel for Petitioners*

